

Exhibit 75
Sarah O'Brien Deposition
Excerpts

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TESLA, INC., a Delaware
corporation,

Plaintiff,

v.

MARTIN TRIPP, an
individual,

Defendant.

MARTIN TRIPP, an
individual,

Counterclaimant,

v.

TESLA, INC., a Delaware
corporation,

Counterdefendant,

Case No.
3:18-cv-00296-LRH-CBC

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Videotaped Deposition of Sarah O'Brien
Menlo Park, California
Wednesday, June 5, 2019

Michael P. Hensley, RDR, CSR No. 14114

Depo Dynamics, LLC
(888) 494-3370

MSJ_871

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1 spokesperson" statement that you did?

2 MS. LIBEU: Objection. Vague and incomplete
3 hypothetical.

4 THE WITNESS: Oh, so you mean beforehand?
5 Because the sheriff's department did issue a statement
6 saying that on the --

7 BY MR. MITCHELL:

8 Q. My -- my question is if you had been aware that
9 the sheriff's office had determined that Mr. Tripp was
10 no threat to anyone at Tesla, would you have
11 nevertheless released that assignment?

12 MS. LIBEU: Objection. Assumes facts not in
13 evidence and incomplete hypothetical.

14 You can still answer.

15 THE WITNESS: Probably parts of it. Because a
16 phone call was still made. From -- the information I
17 had received from -- from the security team was -- was
18 credible. Like, I can actually remember, on the day,
19 being -- you know, genuinely being concerned.

20 BY MR. MITCHELL:

21 Q. Let me ask you this: As a communications
22 professional, does -- would you agree with me that, if
23 it turned out as it did, that Mr. Tripp was no threat to
24 anyone at Tesla, such a statement nevertheless is a very
25 harmful statement to make about a person?

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1 STATE OF CALIFORNIA)
) ss.
2 COUNTY OF ALAMEDA)

3 I, Michael Hensley, Certified Shorthand Reporter,
4 Registered Diplomat Reporter, in and for the State of
5 California, Certificate No. 14114,
6 do hereby certify:

7 That the witness in the foregoing deposition was by
8 me first duly sworn to testify to the truth, the whole
9 truth, and nothing but the truth in the foregoing cause;
10 that said deposition was taken before me at the time and
11 place herein named; that said deposition was reported by
12 me in shorthand and transcribed, through computer-aided
13 transcription, under my direction; and that the
14 foregoing transcript is a true record of the testimony
15 elicited and proceedings had at said deposition.

16 I do further certify that I am a disinterested
17 person and am in no way interested in the outcome of
18 this action or connected with or related to any of the
19 parties in this action or to their respective counsel.

20 In witness whereof, I have hereunto set my hand
21 this 13th day of June, 2019.

22

23

Michael Hensley, CSR NO. 14114

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